

TANNER & ORTEGA, L.L.P.

ATTORNEYS AT LAW
WWW.TANNERORTEGA.COM

HOWARD E. TANNER*
HUGO G. ORTEGA

*MEMBER OF N.Y., N.J. AND D.C. BAR

NEW YORK CITY OFFICE
299 BROADWAY
SUITE 1700
NEW YORK, NY 10007
OFFICE: (212) 962-1333
FAX: (212) 962-1778

Honorable Philip M. Halpern
United States District Judge
United States District Courthouse
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Application denied.

Should there be an opening in the Court's calendar, the Court will accommodate defense counsel's request to reschedule the sentencing to an earlier date.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
July 20, 2023

By ECF and Email/PDF

Re: *USA v. Jonatan Trimino*, 21 Cr. 153 (PMH)
Letter Motion for Modification of Sentencing Date

Dear Judge Halpern:

I am appointed to represent the defendant, Jonatan Trimino, who was previously scheduled to be sentenced by Your Honor on August 22, 2023 at 10:00 am (ECF Doc No. 150). However, on July 17, 2023, I was notified electronically that the Sentencing Hearing was adjourned by the Court to February 6, 2024 at 3:00 pm (ECF Doc No. 160).

I write to the Court to request a modification of this date in order to move up the aforementioned proceedings, to a date convenient for the Court, for sometime this Fall. The reason for this request is that I anticipate making a sentencing recommendation for time served in light of mitigating factors pursuant to 18 USC §3553(a) factors, the Final Probation Presentence Report and the sentences of co-defendants already imposed. The Government has no objection to this request.

Thank you, Your Honor, for your consideration of this application.

Very truly yours,

Tanner & Ortega, L.L.P.



Howard E. Tanner

cc: AUSA Nicholas Bradley (By ECF and Email/PDF)